

**COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

C.A.# 05-10930-NMG

CAROL STASZEWSKI
Plaintiff

v.

WELLESLEY COLLEGE
Defendant

**JOINT MOTION TO EXTEND PRETRIAL DISCOVERY SCHEDULE BY NINETY
DAYS**

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial discovery schedule in this case by ninety days.

Specifically, it is requested that the pretrial discovery schedule be extended as follows:

1. All paper discovery to be served by July 30, 2006.
2. All paper discovery to be responded to by August 3, 2006.

As grounds for this motion, the parties state that they are currently involved in discovery in this action, but that additional time is needed to finish paper discovery. Under the requested extension, the dates for completion of depositions, designating experts, expert discovery and the filing of summary judgment motions and oppositions would remain the same.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, and the pretrial schedule in this case extended as set forth above.

Carol Staszewski
By her attorney

/s/Mitchell J. Notis

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